

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Kiara Nishea Owens  
, Debtor**

**Case No. 24-02773-JAW  
CHAPTER 13**

**NOTICE**

The undersigned counsel for Debtor have filed papers with the court to approve attorney's compensation.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not want the court to grant the Application, or if you want the court to consider your views on the Application, then on or before 21 days, you or your attorney must:

File with the court a written request for a hearing at:

U.S. Bankruptcy Clerk  
U.S. Bankruptcy Court  
Thad Cochran United States Courthouse  
501 E. Court St., Ste 2.300  
Jackson, MS 39201

If you mail your request to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also mail a copy to the Debtor's attorney:

The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
(601) 500-5533

If you or your attorney do not take these steps, the court may decide that you do not oppose the relief sought in the Application and may enter an order granting that relief, which shall sustain this Application for Compensation.

Date: July 22, 2025

Signature: /s/ Thomas C. Rollins, Jr.

Thomas C. Rollins, Jr. (MSBN 103469)  
Jennifer A Curry Calvillo (MSBN 104367)  
The Rollins Law Firm, PLLC  
PO Box 13767  
Jackson, MS 39236  
601-500-5533  
[trollins@therollinsfirm.com](mailto:trollins@therollinsfirm.com)

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Kiara Nishea Owens  
, Debtor**

**Case No. 24-02773-JAW  
CHAPTER 13**

**SECOND APPLICATION FOR ALLOWANCE OF COMPENSATION AND  
REIMBURSEMENT OF NECESSARY EXPENSES  
FOR THOMAS C. ROLLINS, JR.**

COMES NOW, Thomas C. Rollins, Jr., (the “Applicant”) attorney for the Debtor, and files this *Second Application for Allowance of Compensation and Reimbursement of Necessary Expenses for Thomas C. Rollins, Jr.* and in support thereof, would respectfully show to this Honorable Court as follows, to-wit:

1. On November 25, 2024, Debtor filed a bankruptcy petition under Chapter 13 of the bankruptcy code.

**FEE AGREEMENT**

2. The Debtor and Thomas C. Rollins, Jr. of The Rollins Law Firm, PLLC (hereinafter “the firm”), have agreed to an hourly billing arrangement in lieu of this Court’s standard “no look” fee award. Per said agreement, attorney T.C. Rollins is billed at a rate of \$360.00 per hour while attorney Jennifer Calvillo is billed at a rate of \$360.00 per hour. Paralegals are billed at a rate of \$155.00 per hour. Legal Assistants bill at \$100.00 per hour. Said rates are reasonable and in keeping with community custom and standards for attorneys in this area.
3. Throughout its representation of the Debtor herein, Applicant has maintained itemized billing entries which are completed and maintained contemporaneously with the associated service(s) provided.

**RETAINER**

4. The Debtor herein did not provide a retainer.

**FEES PAID TO DATE**

5. The Court previously approved interim compensation in the amount of \$2,502.30 (Dk # 17).
6. The trustee has disbursed \$970.10 on this claim as of July 21, 2025.

**ADDITIONAL FEES REQUESTED**

7. The time incurred and services provided by the firm since the filing of the previous fee application have resulted in Attorney's fees in the amount of \$946.50 and expenses in the amount of \$69.12 for a total of \$1,015.62. A detailed accounting of which is attached hereto as Exhibit "A".
8. This is the Applicants' second request for allowance of compensation for professional services rendered in this proceeding. This request covers the period from January 13, 2025 to July 21, 2025.

**TOTAL FEES FOR SECOND APPROVAL**

9. The time incurred and services provided by the firm during the pendency of this case have resulted in Attorney's fees in the amount of \$3,432.00 and expenses in the amount of \$85.92 for a total of \$3,517.92. A detailed accounting is attached hereto as Exhibit "B".

**A. LODESTAR ANALYSIS**

**1. The prevailing hourly rate in the community under § 330**

The Applicant requests fees based on the following hourly rates: \$360.00 for attorneys, \$155.00 for paralegals, and \$100.00 for legal assistants.

The hourly rates for attorneys with similar skills and experience as consumer bankruptcy attorneys can vary widely, typically ranging from \$200 to \$450 per hour. Due to the specialized nature of bankruptcy law, many attorneys are not proficient in this field. However, with 14 years of experience, approximately 4,000 bankruptcy cases filed, board certification in consumer bankruptcy law, and a strong community reputation, Thomas Rollins is well-qualified to command fees at the higher end of this range. Similarly, Jennifer Calvillo, who has 12 years of experience with the same firm, having worked on 90% of those 4,000 cases, holds board certification in consumer bankruptcy law, is highly regarded in the community, and is a partner in her firm, is equally positioned to charge at the upper end of this spectrum. The Applicants' paraprofessionals charge a blended rate of \$127.50 per hour, which is within the reasonable range for paraprofessional services.

## **2. Reasonable hours expended**

While Chapter 11 lawyers may only be compensated for reasonable time expended that produce a material benefit to the estate, § 330(a)(B) provides that a chapter 13 debtor's attorney can be awarded reasonable compensation for representing the interests of the debtor, based on the benefit and necessity of such services to the debtor and the other factors found in § 330.

The services provided to the Debtor and the expenses incurred by the Applicant were essential for administering the bankruptcy case, safeguarding the Debtor's rights, and fulfilling the Applicant's obligations under the Bankruptcy Code.

An itemization of time is attached as Exhibit "B" and an affidavit of Applicant is attached as Exhibit "C".

### **3. Lodestar calculation**

The lodestar amount for the Applicant's attorneys is \$1,656.00, reflecting 4.6 hours at an hourly rate of \$360.00.

For the Applicant's paraprofessionals, the lodestar amount is \$1,776.00, based on 14.9 hours at a blended rate of \$119.19 per hour.

Together, the total lodestar amount is \$3,432.00, representing a combined total of 19.5 hours at a blended rate of \$176.00 per hour.

## **B. ADJUSTMENTS TO LODESTAR**

After determining the appropriate lodestar amount, the Court must decide whether the application of the § 330 factors and the Johnson factors warrant upward or downward adjustment.

### **1. § 330 Factors**

The following § 330 factors were already discussed when determining the lodestar amount:

- (A) The time spent on such services;
- (B) The rates charged for such services;
- (C) Whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

The remaining § 330 factors are discussed **below**:

- (D) Whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of a case under this title;
  - a. The services provided to the Debtor and the expenses incurred by the Applicant were essential for administering the bankruptcy case, safeguarding the Debtor's rights, and fulfilling the Applicant's obligations under the Bankruptcy Code.

- b. No adjustment is warranted.

- (E) Whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue or task addressed;
  - a. The Applicant did not devote excessive time to drafting schedules, pleadings, or conducting research. A significant amount of time was spent investigating the Debtor's financial situation and gathering the necessary documents for submission to the Trustee. This work was efficiently handled by legal assistants, who billed at \$100.00 per hour.
  - b. No adjustment is warranted.

- (F) With respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

- a. Both Thomas Rollins and Jennifer Calvillo are board-certified in consumer bankruptcy law by the American Board of Certification. In Mississippi, only five bankruptcy practitioners hold this certification, with three based in the state. Of these, two are with the Applicant's firm.
- b. The Applicant's extensive experience has already been addressed in the lodestar analysis.
- c. This factor was taken into account when setting the Applicant's hourly rate, but otherwise supports an upward adjustment.

## **2. Johnson Factors**

The following *Johnson* factors were already discussed when determining the lodestar amount:

1. The time and labor required.
2. The novelty and difficulty of the questions presented.
3. The skill required to perform the legal services properly.
4. The customary fee in the community.
5. Whether the fee is fixed or contingent.
6. The experience, reputation, and ability of the attorneys.

The remaining *Johnson* factors are discussed below:

7. The preclusion of other employment by the attorney due to acceptance of the case.
  - a. Not Applicable.
  - b. No adjustment is warranted.
8. Time limitations imposed by the client or circumstances.
  - a. Not Applicable
  - b. No adjustment is warranted.
9. The amount involved and the results obtained.
  - a. This factor was already discussed in the § 330 analysis (Whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of a case under this title;)
  - b. No adjustment is warranted.
  - c.
10. The undesirability of the case.
  - a. While this case is no less desirable than other chapter 13 cases, when compared to the broader legal community chapter 13 cases have many elements that make them very undesirable.
  - b. **Client Non-Cooperation:** Debtors in Chapter 13 cases may have difficulty gathering the necessary financial documentation or adhering to the repayment plan, which increases the attorney's workload and the chances of case dismissal.
  - c. **Length of the Process:** Chapter 13 cases typically last 5 years, which may lead to diminished client interest and requires attorneys to remain vigilant for potential issues throughout the repayment period. Few practice areas demand such a long-term commitment, where a lawyer must predict an appropriate fee upfront. While some bankruptcy cases are confirmed and proceed smoothly, most require substantial additional work post-confirmation, including handling Motions to Dismiss or Motions for Relief.
  - d. **Risk of Dismissal:** If the debtor fails to make payments or meet other requirements of the repayment plan, the case may be dismissed, and the attorney may not be compensated for all of the work completed. Chapter 13 practitioners collect a shockingly low percentage of allowed fees in chapter 13 cases.
  - e. This factor weighs in favor of an upward adjustment.
11. The nature and length of the professional relationship with the client.
  - a. Applicant had no prior professional relationship with the client prior to their engagement in this matter.
  - b. No adjustment is warranted.

12. Awards in similar cases

- a. The “market rate” of \$4,000.00 is a distorted figure, as attorneys are pressured to accept it to avoid the burdensome fee application process, rather than reflecting a true market rate.
- b. Under § 330(a)(3)(F), the Court is instructed to compensate bankruptcy attorneys at a rate comparable to that of similarly skilled and experienced **non-bankruptcy attorneys**.
- c. This is only one of the twelve Johnson factors. If the Court determines that a downward adjustment is warranted, this factor should be considered alongside the other § 330 and Johnson factors which favor an upward adjustment of the lodestar.
- d. Market rates have been addressed in the lodestar analysis, and no additional adjustment is necessary.

WHEREFORE, PREMISES CONSIDERED, Applicant requests that this Court enter an Order awarding reasonable attorneys’ fees for the professional services rendered herein and authorizing and directing Debtor to pay said attorneys’ fees and expenses. Applicants pray for general relief.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr. (MSBN 103469)  
The Rollins Law Firm, PLLC  
P.O. Box 13767  
Jackson, MS 39236  
601-500-5533

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Application for Compensation was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.  
Thomas C. Rollins, Jr.

1  
2  
3  
4 UNITED STATES BANKRUPTCY COURT  
5 SOUTHERN DISTRICT OF MISSISSIPPI  
6  
78  
9  
10 IN RE:  
11 KIARA NISHEA OWENS12 CASE NO: 24-02773-JAW  
13 **DECLARATION OF MAILING**  
14 **CERTIFICATE OF SERVICE**  
15 Chapter: 13

16 On 7/22/2025, I did cause a copy of the following documents, described below,

17 Notice and Application for Compensation  
18 Exhibit A Invoice  
19 Exhibit B Accounting  
20 Exhibit C Affidavit21 to be served for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with  
22 sufficient postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and  
23 incorporated as if fully set forth herein.24 I caused these documents to be served by utilizing the services of BK Attorney Services, LLC d/b/a certificateofservice.  
25 com, an Approved Bankruptcy Notice Provider authorized by the United States Courts Administrative Office, pursuant to  
26 Fed.R.Bankr.P. 9001(9) and 2002(g)(4). A copy of the declaration of service is attached hereto and incorporated as if  
27 fully set forth herein.28 Parties who are participants in the Courts Electronic Noticing System ("NEF"), if any, were denoted as having been  
29 served electronically with the documents described herein per the ECF/PACER system.

30 DATED: 7/22/2025

31 /s/ Thomas C. Rollins, Jr.  
32 Thomas C. Rollins, Jr. 10346933 The Rollins Law Firm  
34 702 W. Pine Street  
35 Hattiesburg, MS 39401  
36 601 500 5533  
37 trollins@therollinsfirm.com

1  
2  
3       **UNITED STATES BANKRUPTCY COURT**  
4       **SOUTHERN DISTRICT OF MISSISSIPPI**  
56       **IN RE:**  
7       **KIARA NISHEA OWENS**  
89       **CASE NO: 24-02773-JAW**  
1011       **CERTIFICATE OF SERVICE**  
12       **DECLARATION OF MAILING**  
1314       **Chapter: 13**  
1516       On 7/22/2025, a copy of the following documents, described below,  
1718       Notice and Application for Compensation  
1920       Exhibit A Invoice  
2122       Exhibit B Accounting  
2324       Exhibit C Affidavit  
2526       were deposited for delivery by the United States Postal Service, via First Class United States Mail, postage prepaid, with sufficient  
27       postage thereon to the parties listed on the mailing list exhibit, a copy of which is attached hereto and incorporated as if fully set forth  
28       herein.29       The undersigned does hereby declare under penalty of perjury of the laws of the United States that I have served the above  
30       referenced document(s) on the mailing list attached hereto in the manner shown and prepared the Declaration of Certificate of  
31       Service and that it is true and correct to the best of my knowledge, information, and belief.  
3233       **DATED: 7/22/2025**  
3435         
3637       Miles Wood  
38       BK Attorney Services, LLC  
39       d/b/a certificateofservice.com, for  
40       Thomas C. Rollins, Jr.  
41       The Rollins Law Firm  
42       702 W. Pine Street  
43       Hattiesburg, MS 39401  
44

## USPS FIRST CLASS MAILING RECIPIENTS:

Parties with names struck through or labeled CM/ECF SERVICE were not served via First Class USPS Mail Service.

## CASE INFO

LABEL MATRIX FOR LOCAL NOTICING  
 NCRS ADDRESS DOWNLOAD  
 CASE 24-02773-JAW  
 SOUTHERN DISTRICT OF MISSISSIPPI  
 TUE JUL 22 11-21-53 PST 2025

USDA  
 PO BOX 66879  
 ST LOUIS MO 63166-6879

EXCLUDE

US BANKRUPTCY COURT  
 THAD COCHRAN US COURTHOUSE  
 501 E COURT STREET  
 SUITE 2300  
 JACKSON MS 39201 5036

CARMAX AUTO FINANCE  
 ATTN BANKRUPTCY  
 1200 TUCKAHOE CREEK  
 RICHMAN VA 23238

CAVALRY PORTFOLIO  
 ATTN BANKRUPTCY  
 1 AMERICAN LN  
 STE 220  
 GREENWICH CT 06831-2563

CAVALRY SPV I LLC  
 AS ASSIGNEE OF CITIBANK NATHE HOME D  
 PO BOX 4252  
 GREENWICH CT 06831-0405

CHIMESTRIDE BANK  
 ATTN BANKRUPTCY  
 PO BOX 417  
 SAN FRANCISCO CA 94104-0417

DISCOVER BANK  
 PO BOX 3025  
 NEW ALBANY OH 43054-3025

DISCOVER FINANCIAL  
 ATTN BANKRUPTCY  
 PO BOX 3025  
 NEW ALBANY OH 43054-3025

GOLDMAN SACHS BANK USA  
 ATTN BANKRUPTCY  
 PO BOX 70379  
 PHILADELPHIA PA 19176-0379

(P) MOHELA  
 CLAIMS DEPARTMENT  
 633 SPIRIT DRIVE  
 CHESTERFIELD MO 63005-1243

MEMBERS EXCHANGE CU  
 ATTN BANKRUPTCY DEPT  
 PO BOX 31049  
 JACKSON MS 39286-1049

MIDLAND CREDIT MANAGEMENT INC  
 PO BOX 2037  
 WARREN MI 48090-2037

MIDLAND CREDIT MGMT  
 ATTN BANKRUPTCY  
 PO BOX 939069  
 SAN DIEGO CA 92193-9069

NAVY FEDERAL CREDIT UNION  
 POBOX 3000  
 MERRIFIELD VA 22119-3000

NAVY FEDERAL CR UNION  
 ATTN BANKRUPTCY  
 PO BOX 3000  
 MERRIFIELD VA 22119-3000

US ATTORNEY GENERAL  
 US DEPT OF JUSTICE  
 950 PENNSYLVANIA AVENW  
 WASHINGTON DC 20530-0001

EXCLUDE  
 (P) MOHELA  
 CLAIMS DEPARTMENT  
 633 SPIRIT DRIVE  
 CHESTERFIELD MO 63005 1243

USDA RURAL DEVELOPMENT  
 CO US ATTORNEY  
 501 E COURT ST  
 STE 4401  
 JACKSON MS 39201-5022

UNITED STATES TRUSTEE  
 501 EAST COURT STREET  
 SUITE 6 430  
 JACKSON MS 39201 5022

UNITED STATES OF AMERICA  
 UNITED STATES DEPT OF AGRICULTURE  
 CUSTOMER SERVICE CENTER  
 PO BOX 66879  
 ST LOUIS MO 63166-6879

## DEBTOR

KIARA NISHEA OWENS  
 233 OLD HIGHWAY 80 W  
 MORTON MS 39117-3018

EXCLUDE

THOMAS CARL ROLLINS JR  
 THE ROLLINS LAW FIRM PLLC  
 PO BOX 13767  
 JACKSON MS 39236 3767

EXCLUDE

TORRI PARKER MARTIN  
 TORRI PARKER MARTIN CHAPTER 13  
 BANKRUPT  
 200 NORTH CONGRESS STREET STE 400  
 JACKSON MS 39201 1902